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LLC and Third-Party Defendant/Counterclaimant Scott C. Harris

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

(San Jose Division)

ILLINOIS COMPUTER RESEARCH, LLC,

Plaintiff and Counterclaim Defendant,

v.

FISH & RICHARDSON P.C.,

Defendant, Counterclaimant and Third-Party
Plaintiff,

v.

SCOTT C. HARRIS,

Third-Party Defendant and Counterclaimant,

v.

FISH & RICHARDSON P.C.,

Defendant, Counterclaimant, Third-Party
Plaintiff and Counterclaim Defendant.

Case No. CV 08-80075 Misc. JF/HRL

[Action pending in the United States
District Court for the Northern District
of Illinois as Case No. 07 C 5081]

**REQUEST OF ICR AND HARRIS
FOR ORDER ALLOWING
EXHIBITS TO ICR'S AND
HARRIS' RESPONSE TO
FRENKEL'S AND CISCO'S
MOTIONS TO QUASH ICR'S
SUBPOENA FOR DOCUMENTS
AND TESTIMONY TO BE FILED
UNDER SEAL**

Date: May 13, 2008

Time: 10:00 a.m.

Courtroom 2

Hon. Magistrate Judge Howard Lloyd

**** CONFIDENTIAL – FILED UNDER SEAL ****

1 TO THE HONORABLE HOWARD LLOYD:

2 Pursuant to Local Rule 79-5, Illinois Computer Research LLC (ICR[®]) and Scott C. Harris
3 (AHarris[®]) request entry of an Order allowing them to file under seal the following exhibits to
4 ICR^s and Harris= Response to Frenkel^s and Cisco^s Motions to Quash ICR^s Subpoena for
5 Documents and Testimony:

6 (A) Exhibit C - Deposition Transcript of Katherine Lutton;

7 (B) Exhibit D - Deposition Transcript of Peter Devlin;

8 (C) Exhibit E - Letter from Fish & Richardson P.C. to Scott Harris regarding
9 Mr. Harris= capital contribution;

10 (D) Exhibit F - Letter to Michelle Lee of Google from Ray Niro dated August
11 29, 2007.

12 The two deposition transcripts have been designated Confidential by the parties per the
13 Stipulated Protective Order entered on December 7, 2007 in Case No. 07 C 5081 filed in the
14 Northern District of Illinois. The two letters are designated Confidential in compliance with the
15 Stipulated Protective Order which allows the Confidential designation for highly sensitive
16 information.

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1 WHEREFORE, ICR and Harris request entry of an Order allowing them to file the four
2 (4) above-referenced exhibits under seal.

3 DATED: April 22, 2008

REHON & ROBERTS
A Professional Corporation

5 By: Mark V. Isola /s/
6 Peter M. Rehon
7 Mark V. Isola
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9 Defendants ILLINOIS COMPUTER
10 RESEARCH, LLC and Third-Party
11 Defendant and Counterclaim SCOTT C.
12 HARRIS

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28